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10 Attorneys for Plaintiff
11 FACEBOOK, INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION
15

16 FACEBOOK, INC.,

17 Plaintiff,

18 v.

19 POWER VENTURES, INC. a Cayman Island
20 corporation, STEVE VACHANI, an individual;
DOE 1, d/b/a POWER.COM, DOES 2-25,
21 inclusive,

22 Defendants.
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Case No. 5:08-cv-05780-LHK

**DECLARATION OF MONTE COOPER
IN SUPPORT OF FACEBOOK'S
SUPPLEMENTAL REMEDIES BRIEF**

Dept: Courtroom 8, 4th Floor
Judge: Hon. Judge Lucy H. Koh

1 I, Monte Cooper, hereby declare and state as follows:

2 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel of
3 record to Facebook, Inc. in the above-captioned matter. I am a member in good standing of the Bars
4 of the States of California and Colorado. I make this declaration based on my personal knowledge,
5 unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

6 2. Attached hereto as **Exhibit 1** are excerpts from the deposition transcript of Steven
7 Vachani taken on July 20, 2011.

8 3. Attached hereto as **Exhibit 2** are excerpts from the deposition transcript of Power
9 Ventures 30 (b) (6) deposition taken on March 7, 2012.

10 4. Attached hereto as **Exhibit 3** is a true and correct copy of an email from Felipe
11 Herrera to Steve Vachani and Eric Santos, marked as deposition exhibit 238.

12 5. Attached hereto as **Exhibit 4** is a true and correct copy of an email from Andre
13 Fernandes to Elmo Cruz and Julaine Conceicao, marked as deposition exhibit 245.

14 6. Attached hereto as **Exhibit 5** is a true and correct copy of the expert report of Richard
15 J. Ostiller, signed on December 19, 2011.

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my
17 knowledge. Executed this 8th day of March, 2017 in Menlo Park, California.

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19 /s/ Monte Cooper /s/
MONTE COOPER

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